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August 15, 2024

**VIA ECF**

Hon. Mark W. Pedersen, Magistrate Judge  
United States District Court  
Western District of New York  
100 State Street  
Rochester, New York 14614

Re: *Singleton v. The City of Geneva, et al.*,  
Civil Action No.: 6:23-cv-06359-EAW-MJP  
Letter Request for an Extension of the Scheduling Order

Dear Judge Pedersen:

The City of Geneva (the “City”) and Detective Steven Vine (“Det. Vine”) (collectively, “Defendants”), and Plaintiff respectfully submit this letter as a joint request for an extension of the deadlines to complete discovery in the above referenced action based upon good cause. All parties have consented to this request.

The parties have continued to make progress towards completing paper discovery. As of the date of Defendants’ previous request to the Court on June 13, 2024, the parties were awaiting receipt of Plaintiff’s medical records from the NYS Department of Corrections and Community Supervision (“DOCCS”) and Plaintiff’s cell phone records. At that time, Defendants were also finalizing their production to Plaintiff. Defendants promptly served their production as intended, and this week, Defendants received records from DOCCS which has also been produced to Plaintiff. Unfortunately, the parties still await receipt of Plaintiff’s cell phone records from Plaintiff’s phone carrier.

Additionally, Defendants have inquired as to whether Plaintiff is presently treating with any medical or mental health providers. Counsel promptly responded that they would inquire and determine the same. Therefore, Defendants may need to obtain further records from Plaintiff’s current providers. Upon review of the production from the Ontario County District Attorney’s Office, Plaintiff has raised the issue of whether the grand jury minutes are complete. The parties are currently examining and attempting to resolve this issue.

In light of the outstanding records the parties await from Plaintiff’s cell phone carrier and the remaining inquiring the parties are presently examining, Defendants respectfully submit that there is good cause for granting a sixty (60) day extension of the discovery deadlines as follows:

- Paper discovery. The parties shall complete all paper discovery no later than October 15, 2024;



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- Depositions. The parties shall complete all depositions no later than February 14, 2025;
- Close of discovery. The parties shall complete all discovery by April 15, 2025.

The parties have made two prior joint requests for an extension of certain deadlines in the discovery order on April 9, 2024 and June 13, 2024, which were granted. Defendants thank the Court for its time and consideration of this request and are available at the Court's convenience to address any questions.

Respectfully submitted,

A handwritten signature in blue ink that reads "Shannon T. O'Connor".

Shannon T. O'Connor

CC: All Counsel of Record via ECF